

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TYLER DIVISION**

STATE OF TEXAS, *et al.*,

*Plaintiffs,*

v.

UNITED STATES DEPARTMENT OF  
HOMELAND SECURITY, *et al.*,

*Defendants.*

No.: 6:24-cv-00306

**CONSENT MOTION FOR LEAVE TO FILE AMICUS BRIEF**

Oscar Silva Perez, Natalie Taylor, Salvador Doe, Justin Doe,<sup>1</sup> Carmen M. Miranda Zayas, Ricardo Ocampo Hernandez, Jessika Ocampo Hernandez, Foday Turay, Jaxhiel Turay, Genaro Vicencio Palomino, Cindy Siqueiros Maduena, and the Coalition for Humane Immigrant Rights respectfully request the Court's leave to file an amicus curiae brief in support of Defendants' Motion to Vacate Administrative Stay, ECF No. 47. The proposed amicus brief offers a perspective currently absent from the litigation and will assist the Court's consideration of the factors for issuing equitable relief, particularly the factors concerning Texas's alleged irreparable harm, the balance of equities, and the public interest. *Winter v. Nat. Res. Def. Council, Inc.*, 555 U.S. 7, 20 (2008) (setting out four-factor test for awarding injunctive relief); *Libertarian Party of Texas v. Fainter*, 741 F.2d 728, 729 (5th Cir. 1984) (same).

A proposed order is attached.

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<sup>1</sup> Salvador Doe and Justin Doe respectfully renew their Motion to Proceed Under Pseudonym, ECF No. 19.

Dated: September 4, 2024

Respectfully submitted,

**Paige Austin\***

New York Bar No. 5246954  
paige.austin@maketheroadny.org

**Harold A. Solis\***

New York Bar No. 5122726  
Harold.Solis@maketheroadny.org

MAKE THE ROAD NEW YORK  
301 Grove Street  
Brooklyn, NY 11237  
Telephone: (718) 418-7690  
Facsimile: (866) 420-9169

*\* admitted pro hac vice*

/s/ Esther H. Sung

**Esther H. Sung\* (Lead Attorney)**

California Bar No. 255962  
esther.sung@justiceactioncenter.org

**Karen C. Tumlin\***

California Bar No. 234961  
karen.tumlin@justiceactioncenter.org

**Hillary Li\***

Georgia Bar No. 898375  
hillary.li@justiceactioncenter.org

**Laura Flores-Perilla\***

California Bar No. 355645  
laura.flores-perilla@justiceactioncenter.org

**Brandon Galli-Graves\***

Texas Bar No. 24132050  
brandon.galli-graves@justiceactioncenter.org

**Vanessa Rivas-Bernardy\***

California Bar No. 341464  
vanessa.rivas-bernardy@justiceactioncenter.org

JUSTICE ACTION CENTER  
P.O. Box 27280  
Los Angeles, CA 90027  
Telephone: (323) 450-7272  
Facsimile: (323) 450-7276

*Counsel for Amici*

**CERTIFICATE OF SERVICE**

I hereby certify that on September 4, 2024, I electronically filed this motion with the Clerk of the Court for the United States District Court for the Eastern District of Texas by using the CM/ECF system. Counsel in this case are registered CM/ECF users and service will be accomplished by the CM/ECF system.

/s/ Esther H. Sung

Esther H. Sung

**CERTIFICATE OF CONFERENCE**

I hereby certify that counsel for Proposed Intervenors have complied with the meet and confer requirements of Local Rule CV-7(h). The parties to consent to the filing of this motion.

/s/ Esther H. Sung

Esther H. Sung